

**ADMINISTRATIVE
RECORD**

Libby Asbestos Site, Operable Unit 4 Libby, Montana

Record of Deviation/Request for Modification Forms for the Contaminant Screening Study Sampling and Analysis Plan

September 2002



Modification Forms

Record of Deviation/Request for Modification Forms for the Contaminant Screening Study Sampling and Analysis Plan

001

Copy Number

Jim Christiansen

Issued To

This is a **controlled document**. It should be carefully maintained and kept readily available. The holder identified is responsible for maintaining this document in an up-to-date condition by incorporating new sections as they become available. This document must be returned to CDM upon any circumstance that ends the need for the document.

Table of Contents

Modification No.	Description of Deviation	Date Issued
000032	<i>Change to IFF (version 2) and IFF Completion Guidance Documents</i>	6/10/02
000033	<i>Change to Index ID Numbering Procedure</i>	6/10/02
000034	<i>Changes to IFF Completion Procedure</i>	6/10/02
000035	<i>Change to Rinsates Procedure</i>	6/10/02
000036	<i>Change to Soil Field Sample Data Sheet</i>	6/10/02
000037	<i>Change to Soil Sample Collection Procedure</i>	6/10/02
000038	<i>Change to Structure Sketch Procedure</i>	6/29/02
000039	<i>Change to Rinsate Preparation Procedure</i>	6/29/02
000040	<i>Change to Rinsate Sampling Procedure</i>	6/29/02
000041	<i>Change to BD# Assignment Procedure</i>	6/29/02
000042	<i>Change to IFF (version 3)</i>	6/29/02
000043	<i>Change to Secondary Structure IFF Procedure</i>	6/29/02
000044	<i>Change to Equipment Decontamination Procedure</i>	7/15/02
000045	<i>Change to Sample Packaging Procedure</i>	7/15/02
000046	<i>Non-CSS modification</i>	7/11/02
000047	<i>Non-CSS modification</i>	7/11/02

Table of Contents (cont.)

Modification No.	Description of Deviation	Date Issued
000048	<i>Change to IFF (version 4)</i>	7/30/02
000049	<i>Change to Logbook Completion Procedure</i>	9/5/02
000050	<i>Change to IFF Completion Procedure</i>	9/5/02
000051	<i>Change to Product Volume Estimation Procedure</i>	9/5/02
000052	<i>Change to IFF Distribution Procedure</i>	9/5/02
000053	<i>Change of Sampling Progress Tracking Procedure</i>	9/5/02
000054	<i>Change to Decontamination Procedure</i>	9/5/02
000055	<i>Change to FSDS</i>	9/9/02
000056	<i>Change to IFF (version 5)</i>	9/9/02
000057	<i>Change to Duplicate Sample Collection Procedure</i>	9/13/02
000058	<i>Creation of Supplemental IFF</i>	9/13/02



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 6/10/02

Description of Deviation:
Changes to IFF and IFF Completion Guidance Documents

Field Logbook and page number deviation is documented on: Logbook #100057 page 16

Reason for Deviation:
To collect more accurate information regarding owner/occupant
and track property where usable primary sources are present.

Potential Implications of this Deviation:
Additional tracking in Libby V2.

Duration of Deviation (circle one):
Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Add two questions to IFF ① Are primary sources present at the property?
② Where are primary sources materials located. See
attached for changes to IFF Guidance Document.

Technical Review: [Signature] Date: 6/11/02
(Volpe Project Manager or designate) does not apply to CSS

Quality Assurance Review and Approval: [Signature] Date: 6/12/02
(Quality Assurance Coordinator or designate)

Approved By: J. Christian Title: RPM Date: 6/11/02
(USEPA RPM, OSC, or SSC)

[Close](#)

From: Warren, Dee

To: Montera, Jeff

Cc:

Subject: Changes to IFF and IFF Completion Guidance

Sent: 5/22/02 3:50 PM

Importance: Normal

Changes to IFF:

Two questions were removed from the occupant information section and now only appear in the CSS assessment section. These two questions are

1. Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?
2. Is the resident diagnosed with an asbestos related disease?

This change was made because the questions appeared on the IFF twice.

The question: Is the resident diagnosed with an asbestos related disease? was changed to Is the resident, past or present, diagnosed with an asbestos related disease?

Two questions were added to the CSS assessment and titled "Overall Assessment". These questions were added to have a way to track if primary sources were observed anywhere on the property and the general location in which they were observed.

1. Are primary source materials present at the property? Yes or No.
2. Where are primary source materials located? Inside Outside Both NA

Changes made to the IFF completion guidance document should be apparent in the attached file.

If you have any questions, please let me know.

Dee

IFF Guidance Revision 1.doc

Completion of Property Information Field Form

Project: Libby Asbestos Remedial Investigation - Contaminant Screening Study (CSS)

Project No.: 3282-116

Document No.: CDM-LIBBY-04

Approved by: _____

Project Manager

Date

Technical Reviewer

Date

EPA Approval

Date

An information field form (IFF) is to be completed for each structure located on a property. Two IFFs will be used: (1) primary structure and property assessment information field form and (2) secondary structure information field form. The IFFs are completed from both interviews with the occupant/owner and visual inspection of the structures and surrounding properties and are used to facilitate the information-gathering process (interview and visual inspection) of properties during the contaminant screening study (CSS).

Definitions:

Primary structure - Refers to the main inhabitable structure on a property or the main commercial structure on a property.

Secondary structure - Refers to structures other than the primary structure located on a property (i.e., shed, barn, detached garage with an attic, etc.). Attached garages are considered part of the primary structure.

Occupant - Refers to the person currently living in a primary residential structure or business occupying an address.

Owner - Refers to the person who owns a residential property (may or may not be the current occupant) or person who owns a commercial property.

Completion of Property Information Field Form

Primary Structure and Property Assessment Information Field Form

Each entry on the IFF should be completed following the guidance procedure, and any notes on each item should be written in the notes column to the right of each data item.

Header Information

BD#: Refers to the location identification (ID) number of the structure the IFF is being completed for. The field team obtains a list of available numbers from the sample coordinator.

Field Logbook No.: The number of the field logbook that is used to record information specific to the property being assessed on the IFF.

Page No.: The page numbers in the logbook that contain information specific to the property being assessed on the IFF.

Site Visit Date: Date of site visit, in the form MM/DD/YY.

Address: The address of the property being assessed on the IFF. Addresses are to be entered in the following format:

Street number - Direction - Street Name - Street Abbreviation

Where:

Street number = the number of the street address

Direction = the abbreviation of the street direction (N, S, E, or W), when applicable

Street name = correct spelling of the street name

Street abbreviation = when applicable

Road - Rd

Avenue - Ave

Street - St

Circle - Cr

Place - Pl

Boulevard - Blvd

Highway - Hwy

Examples: 510 N Mineral Ave
1616 Rainy Creek Rd
521 Pipe Creek Rd

Completion of Property Information Field Form

Structure Description: Description of the structure specific the IFF (i.e., house, trailer, garage, shed, barn)

Occupant: Name of current occupants or business name of the primary structure. ~~In the case of a commercial property, the occupant information would not be completed.~~

Occupant Phone number: Phone number of occupant of the primary structure.

Owner: Only needs to be completed if the owner of the structure or property is different than the current occupant (i.e., renter). Required for commercial properties.

Owner Phone number: Phone number of the owner of the property. For residential properties, only complete if the owner is different than the current occupant. Required for commercial properties.

Sampling Team: Full name and company of each member of the team assessing the property (i.e., members sampling and/or completing IFF).

Field Form Check Completed by (100% of forms): To be signed, after IFF is checked by the field team member not completing the IFF.

Screening Field check Completed by (2% of forms): To be signed, after IFF is checked by the CSS task leader.

House Attributes

Property Description: Description of the property specific to the IFF being completed.

Surrounding Land Use: Description of the land use groups surrounding the property specific to the IFF being completed. Indicate all that apply.

Year of Construction: Year structure was constructed. If occupant and/or owner do not know what year the structure was complete, choose unknown.

Square Footage: Calculated from the field diagram or estimated from occupant/owner interview.

Completion of Property Information Field Form

Construction Material: Material structure is constructed from. If other than wood, masonry, or stone, choose other and provide a description.

Number of Floors Above Ground: Number of floors above ground specific to the structure that is assessed on the IFF. If other than 1, 2, or 3, provide number of floors in blank. The number of floors above ground should include the attic only if it is used as a living space.

Number of Rooms Per Floor Above Ground: Number of rooms per floor that is above ground. Enter number of rooms per floor next to the floor number. If more than three floors are present, provide the information on the blank.

Basement: If a basement is present, choose yes. If a basement is not present, choose no. Basement refers to a room below ground level that a person can enter and stand upright (i.e., a crawl space is not a basement).

Heating Source: Method by which heat is produced in the structure. If a method other than wood/coal, electric, or propane/gas is used as a heating source, choose other and provide a description.

Heat Distribution: Method by which heat is distributed throughout the structure. Occupant and/or owner should be able to provide this information.

Occupant Information

Number of Adults/Employees: For residences, provide the number of adults that live at the residence; for a commercial property, provide the number of employees that work in the structure.

Number of Children: For residences, provide the number of children living there or visiting a commercial property for an extended period of time per day. ; ~~for a commercial property, indicate the number of children as zero.~~

Years at Location: Number of years current occupant or business has occupied the structure.

Was the residence/building remodeled? Provide yes or no as an answer. If yes, provide years since remodeling and location of remodeling. If occupant/owner is unsure, provide a note in the provided space.

Completion of Property Information Field Form

Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past? Based on occupant/owner interview. Provide yes or no as an answer. If occupant/owner is unsure, provide a note in the provided space.

Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite? Based on occupant/owner interview. Provide yes or no as an answer. If occupant/owner is unsure, provide a note in the provided space.

~~Has any present or former occupant worked at the W.R. Grace mine and/or any former processing plant?~~ Based on occupant/owner interview. Provide yes or no as an answer. ~~If occupant/owner is unsure, provide a note in the provided space.~~

~~Has any present or former occupant been diagnosed with an asbestos-related disease?~~ Based on occupant/owner interview. Provide yes or no as an answer. ~~If occupant/owner is unsure, provide a note in the provided space.~~

Are there any known areas of exposed vermiculite?: Base yes or no answer on occupant/owner interview and visual inspection of home. If yes, provide location of exposed vermiculite.

Indoor Assessment

Vermiculite Insulation Past or Present: Visual inspection of attic is required to answer item. If owner/occupant indicates past presence of vermiculite insulation, note in space provided and year of removal if available. Past or present presence in walls, basements, and crawl spaces can be answered from the occupant/owner interview, but this must be noted in the area provided.

Evidence of Physical Damage? Based on visual inspection of interior

Evidence of Water Damage? Based on visual inspection of interior

Evidence of vermiculite used in building materials? Based on occupant interview and/or visual inspection. If owner is unsure or visual inspection is not comprehensive, provide this information in the notes area.

Completion of Property Information Field Form

Outdoor Assessment

Libby Amphibole Sources Present: Based on visual inspection of the property. If vermiculite piles, tremolite rocks, or other primary sources are observed, provide yes as the answer. If primary sources appear absent but vermiculite is observed in garden soils or other disturbed areas, provide yes as the answer with notes in the area provided.

Proximity to Other Properties with Potential Sources of Libby Amphiboles: Based on observations of nearby properties. If near properties are known to contain potential sources of Libby amphiboles, it should be noted in this data item.

Type and Frequency of Activity Near Vermiculite Material - Indoor: Based on occupant/owner interview. Frequency of contact, duration of contact, and extent of contact are required. If no indoor vermiculite present, provide this information in the notes area.

Type and Frequency of Activity Near Vermiculite Material - Outdoor: Based on occupant/owner interview. Frequency of contact, duration of contact, and extent of contact are required. If no outdoor vermiculite present, provide this information in the notes area.

CSS Assessment

Occupant Information:

- Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property? *Based on verbal interview.*
- Is the resident, past or present, -diagnosed with an asbestos related disease? *Based on verbal interview.*

Indoor Information:

- Does the interior have Libby vermiculite attic insulation? *Based on visual inspection.*
- Did the interior ever have Libby vermiculite attic insulation? *Based on verbal interview.*
- Are there vermiculite additives in any of the building materials? *Based on visual inspections and verbal interview.*

Outdoor Information:

- Is there any evidence of primary source material near the property? *Based on visual inspection.*

Completion of Property Information Field Form

- Could this have been tracked indoors or otherwise spread outdoors on the property? *Based on visual inspections and verbal interview.*

Overall Assessment

- Are primary source materials present at the property?: If any primary source (visible vermiculite indoors, outdoors; tremolite rocks, ZAD) are present answer question yes. If these primary sources are not present answer question no.
- Where are primary source materials located? Inside, Outside, Both, NA: NA will apply if no primary sources are present.

Additional Information

Any information concerning the presence of sources that are identified in the occupant/owner interview.

Field Diagram of Property

To include location of all structures, observed sources, and location of all disturbed areas.

Field Diagram of Primary Structure

To be completed for homes with vermiculite insulation past or present. Complete one sheet per floor and provide scale drawing of rooms.

Secondary Structure Information Field Form

All data items are discussed above. Not all items on the primary structure form are required on the secondary structure form.

Heating Source and Heating Distribution may not be applicable to a secondary structure.



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 (NA)

Requester: Dee Warren Title: CSS
Company: CDM Date: 6/10/02

Description of Deviation:
Change index ID# from CSS-#### to CS-####

Field Logbook and page number deviation is documented on: 10057 page 19
Reason for Deviation:
Version 2 Libby Database unable to accept CSS-#### as an index ID#

Potential Implications of this Deviation:

Duration of Deviation (circle one):
Temporary Date(s): _____
Resident address(es): _____
Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):
Section 5.4.4. Sample Labeling and identifications changes from CSS to CS

Technical Review: [Signature] Date: 6/11/02
(Volpe Project Manager or designate) does not apply to CSS

Quality Assurance Review and Approval: [Signature] Date: 6/12/02
(Quality Assurance Coordinator or designate)

Reviewed By: Jim Christensen Title: RPM Date: 6/11/02
(USEPA RPM, OSC, or SSC)



**Record of Deviation/
Request for Modification**

to the
Libby Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 6/10/02

Description of Deviation:

Changes to IEF completion procedure

Field Logbook and page number deviation is documented on: 100057 page 46

Reason for Deviation:

To collect more accurate data regarding primary sources
of property

Potential Implications of this Deviation:

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See Attached

Technical Review:

[Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 6/11/02

Quality Assurance Review and Approval:

[Signature]
(Quality Assurance Coordinator or designate)

Date: 6/12/02

Approved By: J. Christensen

(USEPA RPM, OSC, or SSC)

Title: RPM

Date: 6/11/02

Location Libby MT Date 6/10/02
Project / Client Libby Asbestos Site - CSR
Volpe Center EPA Region 8

A Soils Team #2: Chris Klothington and

or Bob Alexander logbook # 100071

60800 Attend morning meeting

0.0900 Teams depart office to begin field work

0.1130 Begin completion of Modification form for CSR SAP Field Change:

11 All Field Screening and Sampling

Activities EXCEPT soil sampling will be performed by the Recon team. The IFF will be COMPLETED by the Recon Team.

The soil team will only add sample locations to the property sketch. Changes to SAP Section 4.3.3.1 - Visual Inspection

Second paragraph will be completed by the recon team.

Section 4.3.3.3 - Soil Sampling Sketch

Property will now be completed by the recon team. Soils teams will only add sample locations to the property sketch.

Figure 4.4 - Field Team Soil Sampling

will no longer include yard sketch. Change to Add sample locations to property sketch.



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Klarren Title: CSS Task Leader
Company: CDM Date: 6/10/02

Description of Deviation:

Pinsite samples will not be collected during first week of June

Field Logbook and page number deviation is documented on: 100057 page 47

Reason for Deviation:

No lib to analyze samples

Potential Implications of this Deviation:

Delay on determining relationship between equipped blanks and aqueous
in-site samples

Duration of Deviation (circle one):

Temporary Date(s): 6/10/02 - until laboratory contract determined
Resident address(es): NA

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Technical Review: [Signature] Date: 6/11/02
(Volpe Project Manager or designate) does not apply to CSS

Quality Assurance Review and Approval: [Signature] Date: 6/12/02
(Quality Assurance Coordinator or designate)

Approved By: Jim Christensen Date: 6/11/02
(USEPA RPM, OSC, or SSC) RPM



**Record of Deviation/
Request for Modification**

to the
Libby Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Women Title: CSS Task Leader
Company: CDM Date: 6/10/02

Description of Deviation:
Change to Soil Field Sample Data Sheet

Field Logbook and page number deviation is documented on: 100057 page 47

Reason for Deviation:
To track Field Equipment Blanks

Potential Implications of this Deviation:
Tracking of information in Libby V2 database

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 6/11/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 6/12/02

Approved By: J. Christian
(USEPA RPM, OSC, or SSC)

Title: RPM
6/11/02

Date: _____

Libby, MT

6/10/02

47

Libby Asbestos Site - OS
Volpe Center EPA Region 8

Rinse Samples Section 7.1 - rinse

samples will not be collected during first week of June due to lack of laboratory to conduct analysis. Rinse sample collection will be completed during first week when laboratory is available.

Field Sample Data Sheet - Category changed to include option for Field Blank (lot or equipment) to allow for better tracking of field equipment/lot blank samples.

Changes to Completion of Field Sample Data Sheet Completion Guidance Document: after location description add to category Field Blank (lot or equipment). Circle lot when lot blank collected from silica sand source, circle equipment when equipment blank collected at end of day.



Record of Deviation/
Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren

Title: CSS Task Leader

Company: CDM

Date: 6/10/02

Description of Deviation:

Wet area from where soil samples are collected

Field Logbook and page number deviation is documented on: 100057 pg 47

Reason for Deviation:

To reduce dust generated during soil sample collection.

Potential Implications of this Deviation:

Soils may be recovered wet at processing lab

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached.

Technical Review:

[Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 6/14/02

Quality Assurance Review and Approval:

[Signature]
(Quality Assurance Coordinator or designate)

Date: 6/12/02

Approved By:

J. Christensen
(USEPA RRM, OSC, or SSC)

Title:

RPM

Date:

6/11/02

Libby MT

6/10/02

Libby Asbestos Site-CR

Volpe Center

EPA Region 8

Rinse Samples Section 7.1 - rinse

samples will not be collected during first week of June due to lack of laboratory to conduct analysis. Rinse sample collection will be completed during first week when laboratory is available.

Field Sample Data Sheet - Category changed to include option for Field Blank (lot or equipment) to allow for better tracking of field equipment/lot blank samples.

Changes to Completion of Field Sample Data Sheet Completion Guidance Document: after location description add to category Field Blank (lot or equipment). Circle lot when lot blank collected from silica sand source, circle equipment when equipment blank collected at end of day.



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dec Khrren Title: CSS Task Leader
Company: CDM Date: 6/29/02

Description of Deviation:

Structure sketches will only include approximate dimensions of the attr.

Field Logbook and page number deviation is documented on: 100057 page 108

Reason for Deviation:

The information required from the sketch is used to determine approximate volumes of vermiculite insulation, so only dimensions of the attrics are needed

Potential Implications of this Deviation:

Loss of information regarding room dimension details.

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

① Page 4-6 Structure sketch. The sketch will not include all floors will only include approximate dimensions of the attrics. ② see attached copy of logbook page.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/9/02

Approved By: [Signature] Title: RPM
(USEPA RPM, OSC, or SSC) 3282-116-PP-SAMP-15095

Date: 7/2/02

Location Libby, MT

Date 6/29/02

Project / Client Libby Asbestos Site

Volpe Center

EPA Region 8

Vermiculite observed on property.

1110 - E-mail Jim Christensen regarding property at 113 W Riverside Drive Troy to provide information for letter requested by agent.

1150 - E-mail Jeff Montero to add Lincoln County Animal Shelter to priority sampling list.

1433 - Soils team #3 begins sampling on California.

1445 - Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractors to determine approx. volume of vermiculite, so this step was determined not to be need for homes not containing vermiculite insulation. Also the detail required on the sketch was reduced to just require only an estimated dimensions of the attic. Changes to SAP: Page 4-6 Structure Sketch: Sketch will no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance. There will no longer be

Location Libby, MT

Date 6/29/02

Project / Client Libby Asbestos Site

Volpe Center

EPA Region 8

one sheet completed per floor.

1502 - Prepare Modification Form #000039:

Rinsate preparation method changed to EPA 100.2.

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinsate preparation method changed to EPA Method 100.2 the analytical method will remain the same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513 - Prepare Modification Form #000040:

Rinsate samples are collected using locally available deionized or distilled water.

Changes to SAP: page 5-5 Section 5.4.2

2nd paragraph, 2nd to last sentence "... locally available deionized or distilled water will be used to collect the rinsate sample."

1540 - Prepare Modification Form #000041:

The same BD#s will be used for apartment buildings or buildings with multiple businesses see page 71.



Record of Deviation/ Request for Modification to the

Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 3/12/02) (pending) (approved 3/12/02)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approved 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren

Title: CSS Task Leader

Company: CDM

Date: 6/25/02
24 June 02

Description of Deviation:

Change in site preparation method to EPA Method 100.2

Field Logbook and page number deviation is documented on: Logbook 100057 pg 109

Reason for Deviation:

Method for preparation changed because contracted laboratory could not prepare the samples by the method provided in the SAP.

Potential Implications of this Deviation:

Inconsistency between sample preparation of water samples collected between different SAPs issue discussed with Mary Goldade and deemed to be a minimal concern.

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook page

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/2/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

7/9/02

Approved By:

(USEPA RPM, OSC, or SSC)

Title:

RPM

Date:

7/2/02

Location Libby, MT Date 6/29/02
 Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

vermiculite observed on property.

1110 - E-mail Jim Christensen regarding property at 113 W Riverside Drive. Try to provide information for letter requested by agent.

1150 - E-mail Jeff Montera to add Lincoln County Animal Shelter to priority sampling list.

1433 - Soils team #3 begins sampling on California.

1445 - Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractors to determine approx. volume of vermiculite, so this step was determined not to be need for homes not containing vermiculite insulation. Also the detail required on the sketch was reduced to just require only an estimated dimensions of the attic. Changes to SAP: Page 4-6 Structure Sketch: Sketch will no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance. There will no longer be

Location Libby, MT Date 6/29/02
 Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

one sheet completed per floor.

1502 - Prepare Modification Form #000039:

Rinsate preparation method changed to EPA 100.2.

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinsate preparation method changed to EPA Method 100.2 the analytical method will remain the same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513 - Prepare Modification Form #000040:

Rinsate samples are collected using locally available Deionized or distilled water.

Changes to SAP: page 5-5 Section 5.4.2

2nd paragraph, 2nd to last sentence "locally available deionized or distilled water will be used to collect the rinsate sample."

1540 - Prepare Modification Form #000041:

The same BD#s will be used for apartment buildings or buildings with multiple businesses see page 71.

Duda



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren
Company: CDM

Title: CSS Task Leader
Date: 6/29/02

Description of Deviation:

Locally available deionized or distilled water will be used to
collect rinse samples.

Field Logbook and page number: 100057 pg 69

Reason for Deviation:

ASTM Type II water was deemed unnecessary as the contaminate
of concern is Asbestos

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/9/02

Approved By: James Christensen
(USEPA RPM/OSC, or SSC)

Title: RPM

Date: 7/2/02

Location Libby, MT Date 6/29/02
 Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Vermiculite observed on property.

1110- E-mail Jim Christensen regarding property at 113 W Riverside Drive Troy to provide information for letter requested by agent.

1150- E-mail Jeff Montera to add Lincoln County Animal Shelter to priority sampling list. (2)

1433- Soils team #3 begins sampling on California. (2)

1445- Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractors to determine approx. volume of vermiculite, so this step was determined not to be need for homes not containing vermiculite insulation. Also the detail required on the sketch was reduced to just require only an estimated dimensions of the attic. Changes to SAP: Page 4-6 Structure Sketch: Sketch will no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance: There will no longer be

Location Libby, MT Date 6/29/02
 Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

one sheet completed per floor. (2)

1502- Prepare Modification Form #000039: Rinsate preparation method changed to EPA 100.2. (2)

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinsate preparation method changed to EPA Method 100.2 the analytical method will remain the same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513- Prepare Modification Form #000040: Rinsate samples are collected using locally available Deionized or distilled water. (2)

Changes to SAP: page 5-5 Section 5.4.2 2nd paragraph, 2nd to last sentence "... locally available deionized or distilled water will be used to collect the rinsate sample." (2)

1540 - Prepare Modification Form #000041: The same BD#s will be used for apartment buildings or buildings with multiple businesses see pgs 71. (2)

Dura



Record of Deviation/ Request for Modification to the

Libby: Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren
Company: CDM

Title: CSS Task Leader
Date: 6/29/02

Description of Deviation:

More detail on the collection of RD#. The same RD# will be used for apartments or business at the same address, but the apartment # or suite # will be placed in the structure description field. Field Logbook and page number deviation is documented on: 100057 pg 71

Reason for Deviation:

For database tracking purposes, so the same address will not have multiple GPS coordinates for multiple RD#s that are in same building.

Potential Implications of this Deviation:

Improved tracking of RD#s and address in the Libby Database.

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Insert paragraph into Record GPS Locations Section on page 4-8.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/9/02

Approved By: James Christensen
(USEPA RPM, OSC, or SSC)

Title: RPM

Date: 7/2/02

2/19/02

te

gion 8

men

0735

sampling

Berry,

le

1,

s streets.

m

King on

ota,

HWY 2).

D,

working

14 2.

Munoz

arch,

aw

Fingeret

bered

3. Alexander

10,

Location Libby MT

Date 6/19/02

71

Project / Client Libby Asbestos Site

Volpe Center

EPA Region 8

Nevada, Minnesota, and Dakota.

Soil Team #3: B. Hunt and B. Hiltz

Logbook # 100074 working on Louisiana Ave

Soil Team #4 - Priority Property Team:

B. Pyles, P. Opem, R. Eustice Logbook #

100073 working on priority properties

and HWY 2.

PPE - attic inspection = C, verbal interview = D,

soil sampling = ~~B~~ ^D ~~D~~ ^D

All activities will be conducted in accordance

with the Final SAP for the RICS Libby Asbestos

Site DU4, April 2002

0800 Attend morning meeting. Topic

- Use same BD# for apartments at the

same address, but place apartment #

in the structure description field. Requires

completing MOD form.

0915 Receive call from David Romero (osc)

Concerning property at St. Petig Drive.

Mr. Romero requests dust sampling be

conducted in the ^{DW 6-19-02} basement bedroom

and laundry room

0920 Receive call from EPA Info Center

Dee W. Owen



Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren

Title: CSS Task leader

Company: com

Date: 6/29/02

Description of Deviation:

See page 110 of Logbook 100057. Modification
to IFF form

Field Logbook and page number deviation is documented on: 100057 page 110

Reason for Deviation:

To improve consistency between form completion among
multiple persons.

Potential Implications of this Deviation:

Improved consistency for the completion of IFFs

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages. These changes will
modify the IFF completion SOP.

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/2/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

7/9/02

Approved By:

Jones Christensen
(USEPA RQM, OSC, C, SSC)

Title:

RPM

Date:

7/2/02

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form

Field Logbook No.: _____ Page No.: _____ Site Visit Date: _____
 Address: _____ Structure Description: _____
 Occupant: _____ Phone Number: _____
 Owner (if different than occupant): _____ Phone Number: _____
 Sampling Team: _____
 Field Form Check Completed by (100% of forms): _____
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	Residential Industrial Commercial	
Surrounding Land Use	Residential Industrial Commercial School Mining Other: _____	
Year of Construction	_____ Unknown	
Square Footage		
Construction Material	Wood frame Masonry/Stone Other: _____	
Number of Floors Above Ground	1 2 3 Other: _____	
Number of Rooms Per Floor Above Ground	1: _____ 2: _____ 3: _____ Other: _____	
Basement	Yes No	
Heating Source	Wood/Coal Electric Propane/Gas Other: _____	
Heat Distribution	Forced air Radiant Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
OCCUPANT INFORMATION		
Number of Adults/Employees	0 1 2 3 4 5-15 16-20 21-30 >30	
Number of Children	0 1 2 3 4 Other: _____	
Years at Location	<1 1-5 5-10 10-15 >15	
Was the residence/building remodeled?	Yes No If yes, When (years): <2 2-5 >5 Where: Attic Living Areas Garage Basement Other: _____	
Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past?	Yes No	
Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite?	Yes No	
Are there any known areas of exposed vermiculite?	Yes No If yes, Where: Ceiling Walls Floors Attic Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes No NA Unknown Walls: Yes No NA Unknown Basement: Yes No NA Unknown Crawl Space: Yes No NA Unknown Other: _____	Visual confirmation of current presence or absence required for attic.
Evidence of Physical Damage?	Yes No	
Evidence of Water Damage?	Yes No	
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: Yes No NA Yard: Yes No NA Stockpiles: Yes No NA Other: _____	
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door Within same block Other: _____ Unknown	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency: Once a day Once a week Once a month Once a year Not Applicable	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour 1-2 hours 2-4 hours >4 hours Not Applicable	
	Extent of Contact: Heavy Moderate Light Not Applicable	
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency: Once a day Once a week Once a month Once a year Not Applicable	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour 1-2 hours 2-4 hours >4 hours Not Applicable	
	Extent of Contact: Heavy Moderate Light Not Applicable	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes No Unknown	
Is the resident, past or present, diagnosed with an asbestos related disease?	Yes No Unknown	
Indoor Information		
Does the interior have Zonolite attic insulation?	Yes No Unknown	
Did the interior ever have Zonolite attic insulation?	Yes No Unknown NA	NA applies if attic currently has ZAI.
Are there vermiculite additives in any of the building materials?	Yes No Unknown	
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes No Unknown	
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes No Unknown	
Overall Assessment		
Are primary source materials present at the property?	Yes No	
Where are primary source materials located?	Inside Outside Both NA	
ADDITIONAL INFORMATION _____		

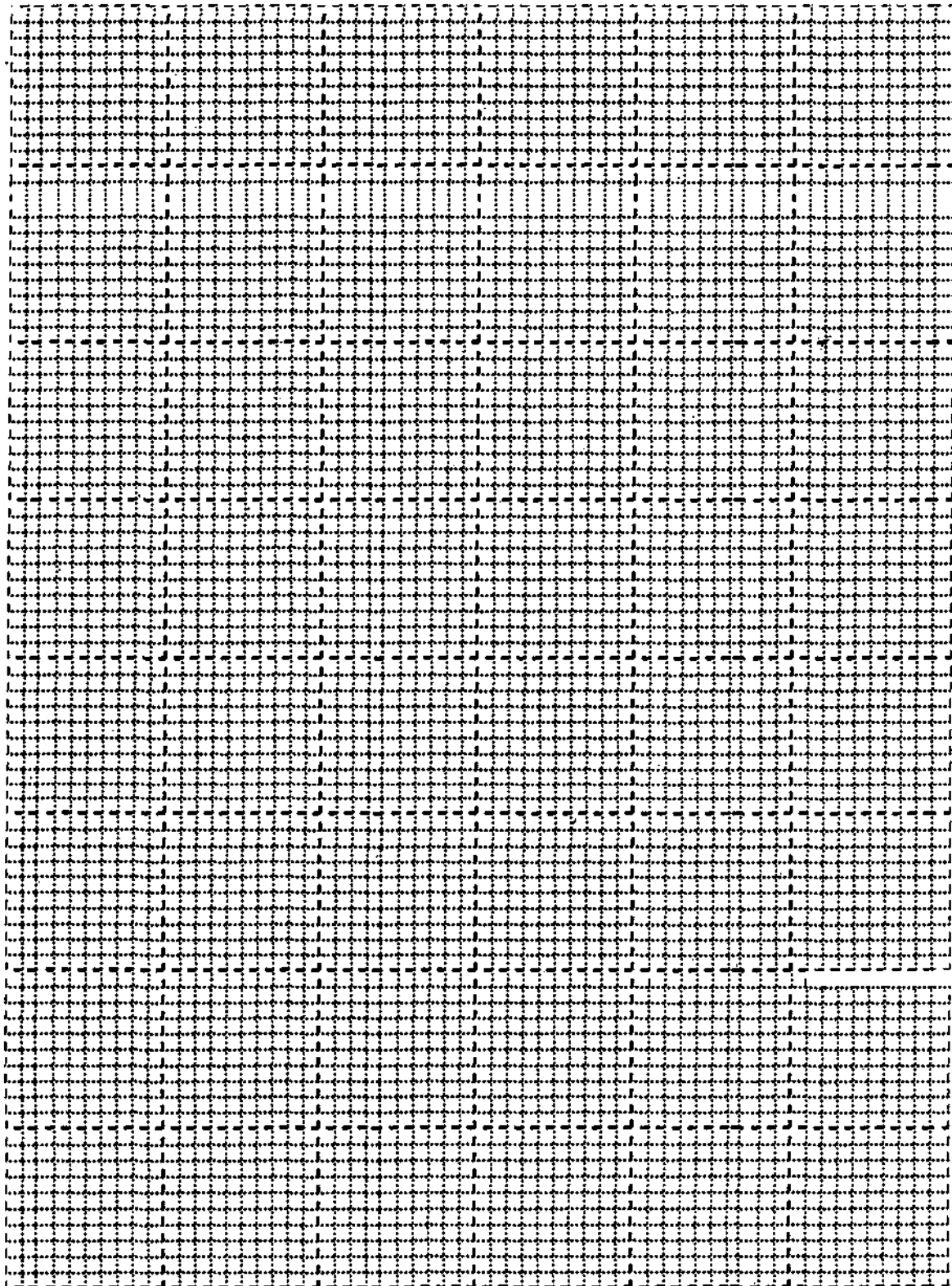
Address: _____

BD# _____

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc).

NOT TO SCALE



CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

FIELD DIAGRAM OF PRIMARY STRUCTURE

Floor of House (circle): First Second Third Basement

Include approximate dimensions of rooms and floor covering type. Use more than one diagram if needed. Completed only if ZAI is present.

Scale: 1/10" = 1 foot

Location Libby, MTDate 6/29/02Project / Client Libby Asbestos SiteVolpe CenterEPA Region 811 1545 Prepare Modification Form 000042:11 Version 3 of Primary Information Field Form.a Following changes were made to the Form11 ① Number of Adults/Employees: 0 is added11 as an option to use when properties are11 (vacant.11 ② Vermiculite Insulation Past or Present11 Portion of the Indoor Assessment: Unknown11 Added as an option to all categories to11 use when ~~issue can be~~ question can not be11 Answered.11 ③ Exposure Assessment: Not Applicable11 Added to all categories as an option. To be11 used when vermiculite is not present at the11 property.11 ④ Did the interior ever have Zonolite attic11 insulation? Question answer NA provided11 to be used if attic currently has ZAL.11 ⑤ Question "Is there evidence of primary11 source materials near the property?" changed to11 "Is there any evidence of primary source11 materials at or near the property?"



**Record of Deviation/
Request for Modification**
to the

Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with _____

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren
Company: CDM

Title: CSS Task Leader
Date: 6/29/02

Description of Deviation:

Secondary Structure IFFs will be completed only when vermiculite is present in the secondary structure.

Field Logbook and page number deviation is documented on: 100057 pg 11

Reason for Deviation:

Secondary IFF not need for documentation when no vermiculite is present. See attached inspiration.

Potential Implications of this Deviation:

None. presence or absence of vermiculite in each structure will be documented in logbook and primary IFF

Duration of Deviation (circle one):

Temporary

Date(s): _____

Resident address(es): _____

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages.

Very important that it is noted as the primary that no U. was identified in 2nd structure

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date: 7/29/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date: 8/29/02

Approved By:

(USEPA RRM, OBC, or SSC)

Title:

RPM

Date:

8/20/02

110 Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

- ve 1545 Prepare Modification Form 000042:
III Version 3 of Primary Information Field Form.
a Following changes were made to the Form
in ① Number of Adults/Employees: 0 is added
as an option to use when properties are
C vacant. ② Vermiculite ⁶⁻²⁹⁻⁰² Insulation Test or Present
in Portion of the Indoor Assessment: Unknown
C added as an option to ⁶⁻²⁹⁻⁰² all categories to
use when ⁶⁻²⁹⁻⁰² issue can be question can not be
A answered. ③ Exposure Assessment: Not Applicable
T added to all categories as an option. To be
C used when vermiculite is not present at the
VI property. ④ Did the interpr ever have Zonlite attic
insulation? Question answer NA provided
to be used if attic currently has ZAL.
C ⑤ Question "Is there evidence of primary
source materials near the property?" changed to
"Is there any evidence of primary source
materials at or near the property?"
1629 Prepare Modification Form 000043:
Secondary Structure IFFs are to be completed

Location Libby, MT Date 6/29/02 111
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

only if vermiculite is observed in that structure
otherwise the lack of vermiculite in a
secondary structure should be noted in the
logbook. ②

Changes to SAP: page 4 to 3rd
paragraph "... IFF will be completed for
every building located within the property
boundary." Will be change to "... IFF
will be completed for every primary
structure and secondary structures ⁶⁻²⁹⁻⁰²
only when vermiculite is present in the
secondary structure." ②

1700- Teams return to office to
complete paperwork.

Dee Wain
6/29/02



Record of Deviation/
Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren
Company: DDM

Title: CSS Task Leader
Date: 7-15-02

Description of Deviation:

Alconox detergent is not used as part of the decontamination procedure and steel brusher will be used to remove gross contamination.

Field Logbook and page number deviation is documented on: 10057 page 132

Reason for Deviation:

Asbestos is not dissolved by detergent. Therefore the use of detergent in the decon procedure is not needed.

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Sit-Specific SDP for Soil Sample Collection: see attached copy of logbook documentation.

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/19/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

7/19/02

Approved By:

(USEPA RPM, OSC, or SSC)

0282-116-PP-SAMP-16211

Libby Asbestos RI SAP

7/19/2002

Record of Deviation/Request for Modification

SQAPP modification [1].doc
6/7/02

RPM

Date:

8/20/02

Location Libby MT

Date 7-15-02

Project / Client

Libby Asbestos Site
Volpe Center EPA Region 8

Location

Date

Project / Client

0715 Review paperwork completed 7-13-02

0800 Attend morning meeting

0900 Receive call from Information Center: Rose Woods @ 1248 Nevada 293-4724

would like to schedule an appointment.

Infor Shawn Oliveira (Recon #3)

1000 Receive call from Angela Frandsen regarding Mod form need for not using Alconox as part of decon.

1027 Prepare modification form #0000484

Alconox detergent w/ 7-15-02 is not being used as part of the decontamination procedures.

Modification To SAP: Site Specific SOP for Soil Sample Collection page 6, first paragraph: "Hosing should be performed by use of deionized water."



Request for Modification
to the
Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.

If the request is made by e-mail, please include the following information in the e-mail body and subject line.

Project WAPT (circle one): RE Study Part a (approved 5/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 7-15-02

Description of Deviation:

Soil samples will be shipped in cooler lined with garbage bags. The garbage bags will be sealed with a Rusty Seal.

Field Logbook and page number deviation is documented on: 100057 page 132-133

Reason for Deviation:

Another step to insure samples are kept under proper custody until they are received at the laboratory.

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/19/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/19/02

Approved By: [Signature]
(USRA RPM, OSC, or SSC)

Title: 8/20/02 RPM

Location Libby MT Date 7-15-02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

0715 Review paperwork completed 7-13-02
0800 Attend morning meeting
0900 Receive call from Information Center: Rose Woods @ 1248 Nevada 293-4724 would like to schedule an appointment. Infor Shawn Oliveira (Recan #3)
1000 Receive call from Angela Frandsen regarding Mod form need for not using Alconox as part of decon.
1027 Prepare modification form #0000424 Alconox detergent w/ 7-15-02 is not being used as part of the decontamination procedures. Modification To SAP: Site Specific SOP for Soil Sample Collection page 6, first paragraph: "Hosing should be performed by use of deionized water."
1050 Relinquish 7-15-02 Fax Mod form 000044 to Angela Frandsen and George Delullo
1052 Relinquish Mod form #000044 to Terry Keller.
1055 Prepare Mod Form #000045 - Samples will be shipped in cooler lined with trash bag, and trash bag will be sealed. Modification To SAP: Page 5-6 Section
DWA

Location Libby MT Date 7-15-02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

5.4.6 Sample Packaging and Shipping -
- Delet modification to Section 1.5.
Procedures.
1100 Fax Mod #000045 to Angela Frandsen and George Delullo
1107 E-mail Jeff Montero with modifications documented in Mod forms 44 and 45.

Modification forms 000046 and 000047 do not pertain to the CSS study and are therefore not included.

000048



Record of Deviation/ Request for Modification to the

Libby Sampling and Quality Assurance Project Plan

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approved 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren
Company: CDM

Title: CSS Task Leader
Date: 7-30-02

Description of Deviation:

Addition of area for recording date of soil sample collection
to the header portion of the primary IFF.

Field Logbook and page number deviation is documented on: 100091 page 19

Reason for Deviation: 7/24/02

To be able to determine if Sam when sample collection occurred
by looking at the IFF

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached logbook pages

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/30/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

8/20/02

Reviewed By:

(USEPA RPM, OSC, or SSC)

Title:

RPM

Date:

8/20/02

BD# _____

☐ Soil samples collected (Date: _____)

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form

Field Logbook No.: _____ Page No.: _____ Site Visit Date: _____
 Address: _____ Structure Description: _____
 Occupant: _____ Phone Number: _____
 Owner (if different than occupant): _____ Phone Number: _____
 Sampling Team: _____
 Field Form Check Completed by (100% of forms): _____
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	Residential Industrial Commercial	
Surrounding Land Use	Residential Industrial Commercial School Mining Other: _____	
Year of Construction	_____ Unknown	
Square Footage		
Construction Material	Wood frame Masonry/Stone Other: _____	
Number of Floors Above Ground	1 2 3 Other: _____	
Number of Rooms Per Floor Above Ground	1: _____ 2: _____ 3: _____ Other: _____	
Basement	Yes No	
Heating Source	Wood/Coal Electric Propane/Gas Other: _____	
Heat Distribution	Forced air Radiant Other: _____	

Location Libby, MT Date 7-30-02 19

Project/Client: Libby Asbestos Site
Volpe Center EPA Region 8

0720 Check paperwork completed
on 7-29-02: Check 12 IFFs completed;
check 27 IFF-recon only; check
28 FSDS

0800 Attend morning meeting

0900 E-mail A. Frandsen with # of
forms checked @ 0720 and 2%

Checks completed 7-29-02

1200 Begin preparation of
Mod Form #000048 for new
page #1 of primary IFF form.

Modification to SAP: Completion of
Property Information Field Form
Guidance document CDM-LIBBY-04
Header information insert following
after BD#: soil samples
collected (Date: _____) To be
completed by soils team with
the date samples are collected
specific to the location of the
BD#. To be in the form
mm/DD/YY.



Record of Deviation/ Request for Modification

000049

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9-5-02

Description of Deviation:

Require printed name of author on each page of the logbook that is
copied for placement in residential folders.

Field Logbook and page number deviation is documented on: 100091 page 97

Reason for Deviation:

Each copied page will stand alone and since these pages are
separated, the original author can be determined if a signature can not be read.

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of
SQAPP when applicable):

See attached copy of logbook entry.

Technical Review: [Signature]
(Volpe Project Manager or designate)

Date: 7/9/02

Quality Assurance Review and Approval:
(Quality Assurance Coordinator or designate)

Jim Christensen

Date: 9/9/02

Approved By: [Signature]
(USEPA OSC or SSC)

Title: RPM

Date: 9/17/02

Location Libby m T Date 9-5-02 97
Project / Client Libby Asbestos Site
Valpe Center EPA Regions

! FF Soil completed = 15; ! FF Recon
completed = 14
0800 Attend morning meeting
0845 Update Team tracking
spreadsheets with numbers of
properties completed for 9-4-02
0900 Attend weekly conference
call for project status
1247 Make phone call from
EPA call lists
1341 E-mail Angela Frandsen
with number of forms checked.
1350 Begin completion of MODIFICATION
Forms needed for filling EPA Audit
Modification #000049 - printed name
of author on each page of a logbook
that will be copied and placed in a
residential folder.
- MOD to SOP - Requires new section
in Section 5 to describe this modification.
Also need a Project-Specific Modification
completed for SOP 4-1



Record of Deviation/ Request for Modification

000050

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 (NA)

Requester: Dee Warren

Title: CSS Task Leader

Company: CDM

Date: 9-8-02

Description of Deviation:

Require North arrow on figures completed on IFFs.

Field Logbook and page number deviation is documented on: 100091 pg 97 and 98

Reason for Deviation:

To require north arrow on figures to help with orientation during soil sampling

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook entry

Technical Review:

[Signature]
(Volpe Project Manager or designate)

Date: 9/9/02

Quality Assurance Review and Approval:

[Signature]
(Quality Assurance Coordinator or designate)

Date: 9/9/02

Approved By:

[Signature]
(USEPA OSC or SSC)

Title:

RPM

Date:

9/17/02

Location Libby MT Date 9-5-02 97
Project / Client: Libby Asbestos Site
Valpe Center EPA Regions

1 FF Soil completed = 15; 1 FF Recon
completed = 14

0800 Attend morning meeting

0845 Update team tracking
spreadsheets with numbers of
properties completed for 9-4-02

0900 Attend weekly conference
call for project status

1247 make phone call from
EPA call lists

1341 E-mail Angela Frandsen
with number of forms checked.

1350 Begin completion of MODIFICATION
FORMS needed following EPA Audit
Modification #000049 - printed name
of author on each page of a logbook
that will be copied and placed in a
residential folder.

- MOD to SOP - Requires new section
in Section 5 to describe this modification.
Also need a Project-Specific Modification
Completed for SOP 4-1

Modification #000050 - require north
arrow to be included on property sketches

Dee Wane

96

Location

Libby MT

Date

9-5-02

Project / Client

Libby Asbestos Site

Volpe Center

EPA Region 8

Completed on IFFs

-MOD TO SAP add to Field Diagram of
Property instructions page 2 of Completion
of Property IFF "To include north arrow."
Also add to top of Page 6 on IFF
Identify important features (i.e. north arrow).



Record of Deviation/ Request for Modification

000051

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities

Instructions to Requester: Fax to contacts at bottom of form for review and approval.

File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9-5-02

Description of Deviation:

Determination of primary source volumes and product percentage as described in Section 4.3.3.1 page 4-3 paragraph 2 has not and will not be done.

Field Logbook and page number deviation is documented on: 100091 pg 98

Reason for Deviation:

Field observations completed during reconnaissance and sampling can not accurately as of 8-30-02 gather this information accurately.

Potential Implications of this Deviation:

Volume estimates for removal determinations based on CSS information will only be gross estimates

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages

Technical Review: [Signature]
(Volpe Project Manager or designate)

Date: 9/9/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 9/9/02

Approved By: [Signature]
(USEPA OSC or SSC)

Title: RPM

Date: 9/17/02

98

Location

Libby MT

Date

9-2-02

Project / Client

Libby Asbestos Site

Volpe Center

EPA Region 8

Completed on IFFs

-MOD TO SAP add to Field Diagram of Property Instructions page 7 of Completion of Property IFF "To include north arrow."

Also add to top of Page 6 on IFF Identify important features (i.e. north arrow).

Modification 000051: Determination of approximate volume by estimation, and percentage of product as described in Section 4.3.3.1 page 45 paragraph 2 will not be done.

-MOD TO SAP remove in Third sentence of Second paragraph: "Instead, the field team will record the location of contaminant sources on the IFF and in the logbook."

**Record of Deviation/
Request for Modification**

000052

to the
**Libby Sampling and Quality Assurance Project Plan
Field Activities****Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)Scenario No. (circle one): 1 2 3 4 NARequester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9/5/02Description of Deviation:
IFFs are mailed to Volpe weekly instead of forced dailyField Logbook and page number deviation is documented on: 100091 pg 98Reason for Deviation:
Number of pages to fax every day can not be done efficiently.Potential Implications of this Deviation:
IFFs are received up to seven days after they are completed.Duration of Deviation (circle one):
Temporary Date(s): _____
Resident address(es): _____
Permanent (complete Proposed Modification Section)Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):
See attached copy of logbook pageTechnical Review: [Signature] Date: 9/9/02
(Volpe Project Manager or designate)Quality Assurance Review and Approval: [Signature] Date: 9/9/02
(Quality Assurance Coordinator or designate)Approved By: Jin Christensen Title: RPM Date: 9/17/02
(USEPA QSC or SSC)

98

Location Libby MT Date 9-5-02Project / Client Libby Ashcroft SiteVolpe Center EPA Region 8

Completed on IFFs

-MOD TO SAP add to Field Diagram of Property instructions page 7 of Completion of Property IFF "To include north arrow...."

Also add to top of Page 6 on IFF

Identify important features (i.e. north arrow....)

Modification 000051: Determination

of approximate volume by estimation, and

percentage of product as described in

Section 4.3.3.1 page 4-5 paragraph 2

will not be done.

-MOD TO SAP ~~remove~~ ⁹⁻⁵⁻⁰² Third sentence

of Second paragraph: "Instead ⁹⁻⁵⁻⁰² the

field team will record ~~also~~ the location of

contaminate sources on the IFF and in the

Logbook."

Modification 000052: IFF forms are

mailed to Volpe weekly not faxed daily

-MOD TO SAP: Section 5.5 Information field

Forms page 5-6 last sentence "An

additional copy will be ~~faxed~~ ⁹⁻⁵⁻⁰² to the Volpe

~~Center~~ ⁹⁻⁵⁻⁰² mailed to the Volpe Center weekly

for data entry."



Record of Deviation/ Request for Modification

000058

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9/5/02

Description of Deviation:

Use of grid, quadrant, and section numbers will not be used.
Tracking progress will be done by streets.

Field Logbook and page number deviation is documented on: 100091 pg 99

Reason for Deviation:

Current parcel information provided by the city and county does not
include all properties. It is more efficient to work on a street basis than
a grid.

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of log book page

Technical Review:

(Volpe Project Manager or designate)

Date:

9/9/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

9/9/02

Approved By:

(USEPA OSC or SSC)

Title:

RPM

Date:

9/17/02

Location Libby mT Date 9-5-02 99
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Modification 000053: Study Grid
Area Grid will not be used.
MOD TO SAP: Section 4.3.1.2
~~not per 9-5-02~~ not applicable and
Completion of FSDS (COM-LIBBY-03)
page 3 omit reference to Grid, Quadrant,
Section requirement. This field 9-5-02

**Record of Deviation/
Request for Modification**

000054

to the
**Libby Sampling and Quality Assurance Project Plan
Field Activities****Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NARequester: Dee Warren
Company: CDMTitle: CSS Task Leader
Date: 9-5-02

Description of Deviation:

Decontamination will be ~~use~~ use a plastic brush and paper towels
maybe used to dry equipment. Also, equipment will periodically be cleaned
using alcohol.

Field Logbook and page number deviation is documented on: _____

Reason for Deviation:

Metal brushes being used were scratching equipment. Plastic
brushes will remove any asbestos but all equipment will also be cleaned
using alcohol.

Potential Implications of this Deviation:

NONE

Duration of Deviation (circle one):

Temporary

Date(s): _____

Resident address(es): _____

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of
SQAPP when applicable):See attached copy of log book page

Technical Review: _____

(Volpe Project Manager or designate)

Date: 9/9/02

Quality Assurance Review and Approval: _____

(Quality Assurance Coordinator or designate)

Date: 9/9/02

Approved By: _____

(USEPA QSC or SSC)

Title: RPMDate: 9/17/02

Location Libby MT Date 9-5-02 99
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Modification 000053: Study ~~End~~ ^{@ 9-5-02}

Area Grid will not be used.

-MOD TO SAP: Section 4.3.1.2

~~not applicable and~~ ^{@ 9-5-02} Completion of FSDS (COM-LIBBY-03)

page 3 omit reference to Grid, Quadrant,
Section requirement. ~~This field~~ ^{@ 9-5-02}

Modification 000054: Decon procedure

~~includes~~ ^{@ 9-5-02} includes use of
a plastic brush and paper towels to
dry equipment.

-MOD TO SAP: Page 6 of Site Specific
SOP for Soil Sample Collection

(COM-LIBBY-05) first paragraph

Equipment may be dried using a
paper towel.

Equipment will be periodically cleaned
using alcohol.

**Record of Deviation/
Request for Modification**

000055

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9/9/02

Description of Deviation:
Modify FSDS to remove requirement of grid/quadrant/section

Field Logbook and page number deviation is documented on: 100091 pg 106-107Reason for Deviation: Grid/quadrant/section not being used

Potential Implications of this Deviation:

NONE

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook page

Technical Review:

(Volpe Project Manager or designate)

Date:

9/10/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

9/10/02

Approved By:

(USEPA OSC or SSC)

Title:

RPM

Date:

9/17/02



Record of Deviation/ Request for Modification

000056

to the
Libby Sampling and Quality Assurance Project Plan
Field Activities

Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 9-9-02

Description of Deviation: ⁹⁻⁹⁻⁰²
Changes to IFF. I see attached copy of logbook page

Field Logbook and page number deviation is documented on: 100091 pg 107
Reason for Deviation: Changes to IFF needed due to other modifications

Potential Implications of this Deviation:

NONE

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See copy of logbook pages

Technical Review: [Signature]
(Volpe Project Manager or designate)

Date: 9/10/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 9/10/02

Approved By: J. Christianse
(USEPA OSC or SSC)

Title: RPM

Date: 9/17/02

**Record of Deviation/
Request for Modification**

000057

to the
**Libby Sampling and Quality Assurance Project Plan
Field Activities****Instructions to Requester: Fax to contacts at bottom of form for review and approval.
File approved copy with Data Manager and fax copy to SRC.**Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)Scenario No. (circle one): 1 2 3 4 NARequester: Dee Warren Title: CSS Task Leader
Company: COM Date: 9-13-02

Description of Deviation:

Duplicate sample collection.Field Logbook and page number deviation is documented on: 100091 pg. 76-77

Reason for Deviation:

Sample collection procedure changed (see attached letter to Jim Christensen)

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary

Date(s): _____

Resident address(es): _____

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Field duplicate sample collection procedure added to Soil Sample Collection SOP COM-LIBBY-05

Technical Review:

(Volpe Project Manager or designate)

Date:

9/13/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

9/13/02

Approved By:

(USEPA OSC or SSC)

Title:

9/17/02

Date:

9/17/02

Location Libby MT

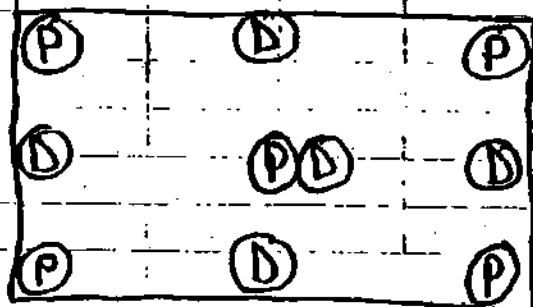
Date **8-22-02**

Project Name: Libby Antibio Site

Volpe Center EPA Region 8

~~skills used for planning, monitoring, and risk~~
~~management procedures for the project~~

③ Duplicate sample ⁰⁸⁻²²⁻⁰¹ prep. collection procedure does not appear to be correct. As samples are collected now - extra volume is placed in the mixing bowl and homogenized then the portion in the bowl is placed in two different bags and becomes the original sample and a duplicate. Auditor feels this is more of a split sample. Suggestion is to collect the duplicate same as co-located area samples where ⁰⁸⁻²²⁻⁰¹ sample the parent sample (P) would be collected then the duplicate sample (D) would be collected from the same land use area but ⁰⁸⁻²²⁻⁰¹ not adjacent to or with the parent sample but in a "random" fashion within the same area. See below figure.



P:O would be composite samples of the same

Location Libby, MT

Date **8-22-02**

Project / Client Libby Asherby Site

Volpe Center EPA Region 8

number of subsamples. ~~① Sample~~
~~transformation. Note 6.22.05. Following~~
~~should be removed from the sample~~
~~after sample transformation begins.~~
~~② Sample collection time should not be~~
~~recorded until the number of samples collected~~
~~is 8-22-05~~
~~for the transformation~~

~~① Sample section of the specimen is
observed under microscope to determine
the quantity of vermiculite present. No. 2-20-
The sample is then dried in the oven and
weighed. The weight of the sample is then
determined by comparing the weight of the
sample with the weight of the sample.~~

~~144: C. maculipes Harber paper on~~
~~Clark Court~~
~~153: Clark and Irving, April 1819~~
~~paper on Clark and Irving~~
~~sampled~~
~~1900 Report of J. J. J.~~

Oldham
8-22-02



28 North Last Chance Gulch
Helena, Montana 59601
tel: 406 485-1414
fax: 406 495-1025

September 13, 2002

Jim Christiansen
United States Environmental Protection Agency
999 18th Street
Denver, CO 80202

Subject: Field Duplicate Sample Collection for the Libby Asbestos Site, Remedial Investigation (RI), Contaminant Screening Study (CSS)

Dear Mr. Christiansen:

Based on comments from Mary Goldade and an independent audit performed on the CSS during August of 2002, a change will be made in the collection procedure for field duplicate samples associated with the CSS. Duplicate samples previously collected as part of the CSS were collected by splitting a homogenized sample, and collected using the same sampling equipment. Beginning September 16, 2002, field duplicate samples will be collected using the following procedure:

A parent sample will be collected from up to 5 subsamples in a given land use area. The duplicate of this sample will be collected from the same number (i.e., 5) of randomly located subsamples in the same land use area. These samples will be independently collected with separate sampling equipment. The reason for this change is to better determine the variability of sample results in a given land use area. See Figure 1.

All previously (before September 16, 2002) duplicate samples will be referred to as field splits.

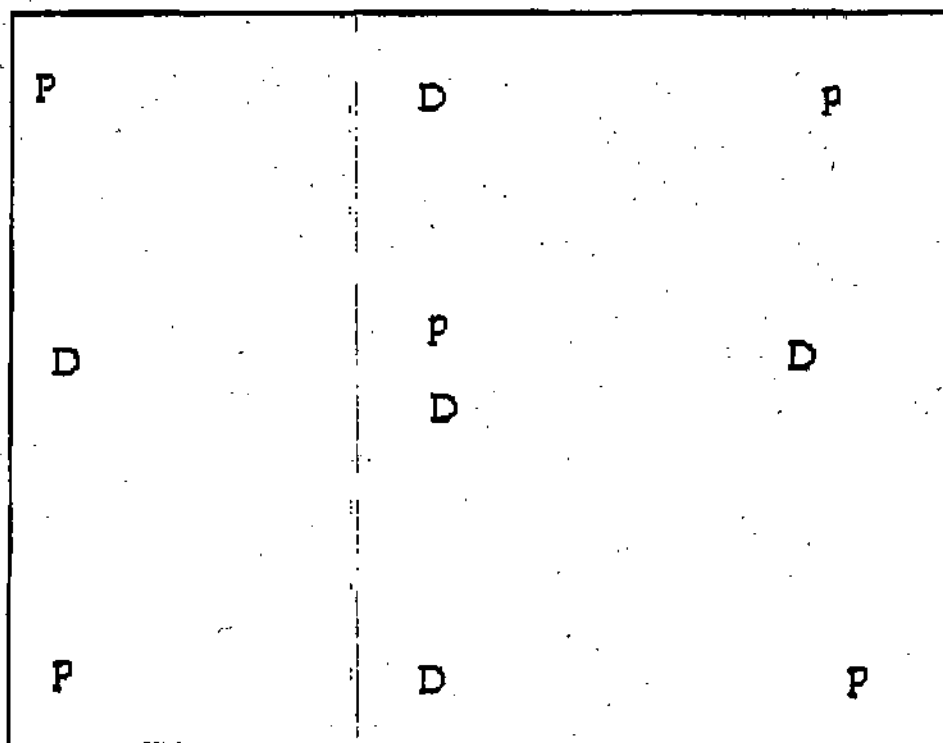
Very truly yours,

Dee Warren
CSS Task Leader
Camp Dresser & McKee Inc.
cc: Mary Goldade (EPA)
Jeff Montera (CDM)
Angela Frandsen (CDM)

Document code

Jim Christiansen
September 12, 2002
Page 2

Figure 1 Field Duplicate Sample Collection from Land Use Areas



p = Subsample locations of parent sample
D = Subsample locations of duplicate sample

**Record of Deviation/
Request for Modification**

000058

to the
**Libby Sampling and Quality Assurance Project Plan
Field Activities****Instructions to Requester: Fax to contacts at bottom of form for review and approval.****File approved copy with Data Manager and fax copy to SRC.**

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NARequester: Dee WarrenTitle: CSS Task LeaderCompany: CDMDate: 9-13-02

Description of Deviation:

USE a Supplemental IFF for properties that had background information
field forms completed as part of phase I dust sampling programField Logbook and page number deviation is documented on: 100091 page 117-118

Reason for Deviation:

Complete IFFs are not needed for homes where a background IFF
was completed under phase I

Potential Implications of this Deviation:

NONE

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages and supplemental IFFTechnical Review: [Signature]
(Volpe Project Manager or designate)Date: 9/16/02Quality Assurance Review and Approval:
(Quality Assurance Coordinator or designate)Date: 9/16/02Approved By: [Signature]
(USEPA OSC or SSC)Title: RPMDate: 9/17/02

De Wijk

118

Location Libby MTDate 9-13-02Project / Client Libby Asbestos SiteValpe CenterEPA Region 8

Visual Inspection - Insert new 3rd paragraph
"A Supplemental IFF will be completed for
properties sampled under the Phase I
dust sampling program when a BIFF was
completed for the property."

The procedure for completing the SIFF will
follow CDM-LIBBY-04 but on specific to
information required on SIFF: Header information
Phase I Background IFF No.; Indoor Assessment;
~~Outdoor Assessment~~ #1302 Vermiculite
Insulation Pest or Present; Outdoor Assessment;
Exposure Assessment; CSS Assessment;
Field Diagram of Property; Structure Sketch.

BD# _____

Phase 1 Background IFF No. _____

☐ Soil samples collected (Date: _____)**LIBBY ASBESTOS PROJECT
Contaminant Screening Study****Primary Structure and Property Assessment Supplemental Information Field Form (SFI)**

Field Logbook No.: _____ Page No.: _____ Site Visit Date: _____

Address: _____ Structure Description: _____

Occupant: _____ Phone Number: _____

Owner (if different than occupant): _____ Phone Number: _____

Sampling Team: _____

Field Form Check Completed by (100% of forms): _____

Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes No NA Unknown Walls: Yes No NA Unknown Basement: Yes No NA Unknown Crawl Space: Yes No NA Unknown Other: _____	Visual confirmation of current presence or absence required for attic.
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: Yes No NA Yard: Yes No NA Stockpiles: Yes No NA Other: _____	
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door Within same block Other: _____ Unknown	

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency: <ul style="list-style-type: none"> Once a day Once a week Once a month Once a year Not Applicable 	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <ul style="list-style-type: none"> <1 hour 1-2 hours 2-4 hours >4 hours Not Applicable 	
	Extent of Contact: <ul style="list-style-type: none"> Heavy Moderate Light Not Applicable 	
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency: <ul style="list-style-type: none"> Once a day Once a week Once a month Once a year Not Applicable 	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <ul style="list-style-type: none"> <1 hour 1-2 hours 2-4 hours >4 hours Not Applicable 	
	Extent of Contact: <ul style="list-style-type: none"> Heavy Moderate Light Not Applicable 	

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes No Unknown	
Is the resident, past or present, diagnosed with an asbestos related disease?	Yes No Unknown	
Indoor Information		
Does the interior have Zonolite attic insulation?	Yes No Unknown	
Did the interior ever have Zonolite attic insulation?	Yes No Unknown NA	NA applies if attic currently has ZA
Are there vermiculite additives in any of the building materials?	Yes No Unknown	
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes No Unknown	
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes No Unknown	
Overall Assessment		
Are primary source materials present at the property?	Yes No	
Where are primary source materials located?	Inside Outside Both NA	
ADDITIONAL INFORMATION		

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

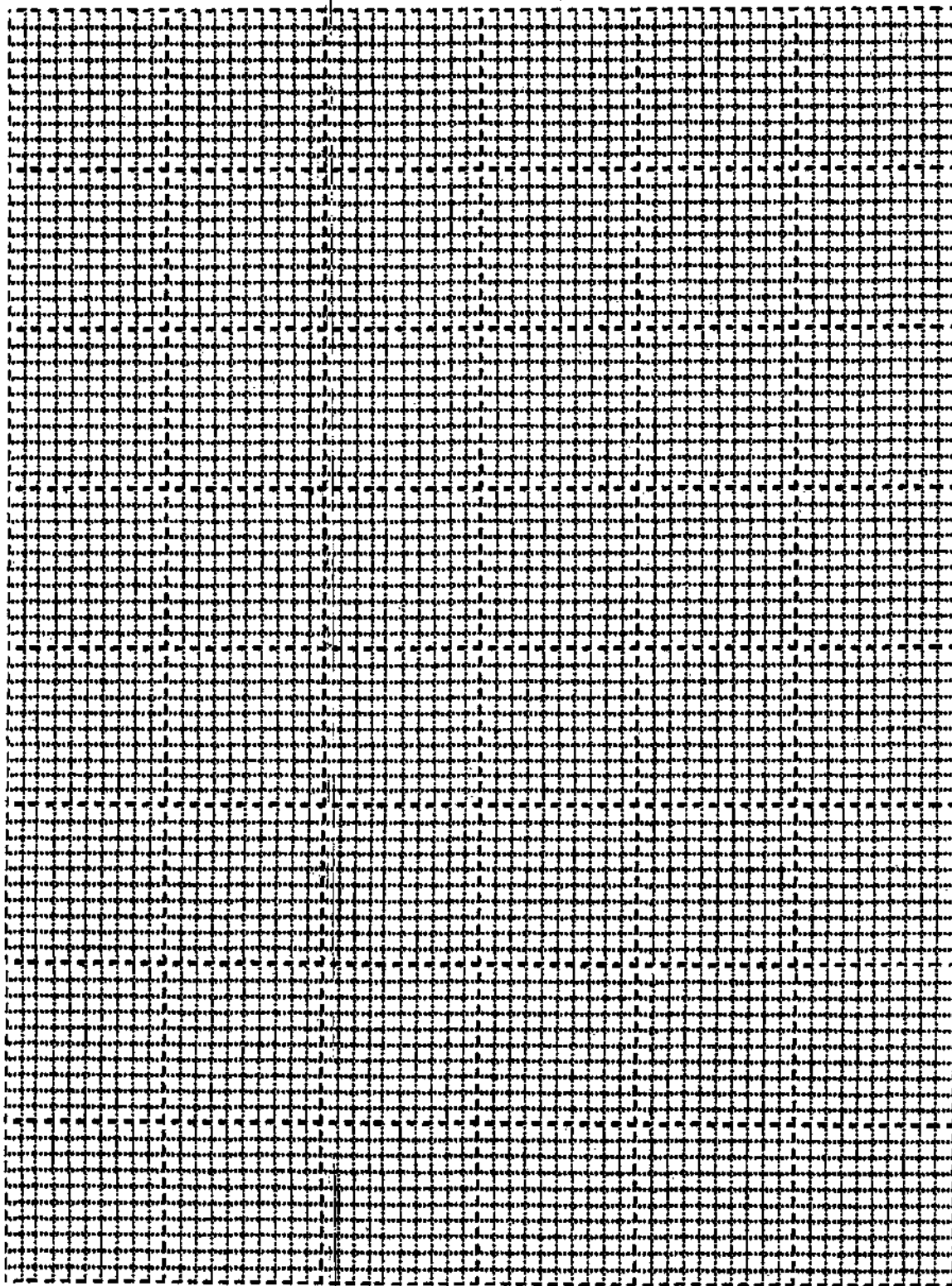
Address: _____

BD# _____

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc). Include north arrow.

NOT TO SCALE



SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

FIELD DIAGRAM OF PRIMARY STRUCTURE

Include approximate dimensions of attic. Use more than one diagram if needed. Completed only if ZAI is present.

Scale: 1/10" = 1 foot

